RENE L. VALLADARES 1 Federal Public Defender Nevada State Bar No. 11479 2 CHRISTOPHER P. FREY Assistant Federal Public Defender 3 Nevada State Bar No. 10589 201 W. Liberty Street, Suite 102 4 Reno, Nevada 89501 (775) 321-8451/Tel. 5 (775) 784-5369/Fax chris frey@fd.org 6 Attorney for EDUARDO ALVAREZ, JR. 7 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 11 UNITED STATES OF AMERICA, Case No. 3:19-CR-00048-MMD-WGC 12 Plaintiff, 13 STIPULATION TO CONTINUE v. **HEARING ON PRETRIAL** 14 **RELEASE** EDUARDO ALVAREZ, JR., (FIRST REQUEST) 15 Defendant. 16 17 IT IS HEREBY STIPULATED AND AGREED by and through RENE L. 18 VALLADARES, Federal Public Defender and CHRISTOPHER P. FREY, Assistant Federal 19 20 Public Defender, counsel for EDUARDO ALVAREZ, JR. and NICHOLAS A. TRUTANICH, 21 United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for 22 the UNITED STATES OF AMERICA, that the hearing regarding petition for action on 23 conditions of pretrial release set for July 16, 2020, at 11:00 AM, be vacated and continued one 24 week. 25 /// 26

1 This Stipulation is entered into for the following reasons: 2 Mr. Alvarez is scheduled to appear before this court for a Revocation Hearing on July 3 16, 2020, at 11:00 AM. Undersigned counsel request that this matter be continued one week, to 4 allow the parties to continue negotiations toward a resolution of this matter. 5 1. Failure to grant this extension of time would deprive the defendant continuity 6 of counsel and the effective assistance of counsel. 7 Mr. Alvarez is currently on bond. 2. 8 3. The parties agree to the continuance. 9 4. Defense counsel has spoken with pretrial services and they agree to the 10 continuance. 11 5. This is the first request for a continuance. 12 DATED this 14th day of July, 2020. 13 14 RENE L. VALLADARES NICHOLAS A. TRUTANICH Federal Public Defender United States Attorney 15 16 By <u>/s/ Christopher P. Frey</u> CHRISTOPHER P. FREY By <u>/s/Megan Rachow</u> MEGAN RACHOW 17 Assistant Federal Public Defender **Assistant United States Attorney** Counsel for Counsel for the Government 18 EDUARDO ALVAREZ, JR. 19 20 21 22 23 24 25 26

ORDER Based on the Stipulation of counsel, and good cause appearing, IT IS THEREFORE ORDERED that the Revocation Hearing currently set for July 16, 2020, at 11:00 AM, be vacated and continued one week to Thursday, July 23, 2020 the hour of 3:30 p.m. DATED this 15th day of July, 2020. UNITED STATES MAGISTRATE JUDGE